

OCT 18 2021

JULIA C. DUDLEY, CLERK

BY: [Signature] DEPUTY CLERK

In the United States District Court for the
Western District of Virginia
Charlottesville Division

Sines, et al, Plaintiffs vs
Kessler, et al, Defendants | Case No. 3:17-cv-072

Defendant's Request For Documents

Comes now the Defendant, Christopher Cantwell, and he moves this Court to make available to him certain documents necessary for trial preparation. In support, he states as follows

- 1) Cantwell has separately moved to compel paper production of all digital discovery and filings to date. The impracticality of granting this request in its entirety has been made clear to Cantwell, using as one example thousands of JPEG image files which are the still frames of a lengthy videos.
- 2) At the time of this writing, on October 9th, Cantwell awaits the Court's decision on his motions to continue this trial and re-open discovery. Unless those requests are granted, trial is imminent, and detailed negotiations over what may, should, or must be produced waste precious time.
- 3) Being transported for trial has seen Cantwell stripped of all his documents for the 3rd time this year.

- 4) Cantwell is incarcerated, indigent, and has filed an IFP application in response ~~to~~ to the Court's concerns over the costs of his transportation.
- 5) In myriad other filings, Cantwell has informed the Court of his many troubles preparing for the trial.
- 6) The Plaintiffs have raised in excess of \$10,000,000 by broadcasting falsehoods about the Defendants under the social media hashtag bullying campaign of #SueANazi.
- 7) Cantwell cannot defend himself in Court if he has no idea what the evidence is or what the witnesses will testify to.
- 8) For the above reasons, the Court should make available to Cantwell, whether at Plaintiffs' expense, taxpayer expense, or at the expense of the materials source, but at no expense to Cantwell, all documents listed in Exhibit A attached to this Motion.

Respectfully Submitted,
Christopher Cantwell 10-9-2021 